

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

RICHARD JORDAN and RICKY CHASE

Plaintiffs

**THOMAS EDWIN LODEN, JR.,
ROGER ERIC THORSON, and
ROBERT SIMON, JR.**

Intervenors

vs.

No. 3:15-cv-00295-HTW-LRA

**PELICIA HALL, Commissioner,
Mississippi Department of Corrections, in
her Official Capacity; EARNEST LEE
Superintendent, Mississippi State Penitentiary,
in his Official Capacity; THE MISSISSIPPI
STATE EXECUTIONER, in his Official
Capacity; an UNKNOWN EXECUTIONERS,
in their Official Capacities**

Defendants

DEFENDANTS' SECOND SUPPLEMENT TO MOTION FOR PROTECTIVE ORDER

COME NOW Defendants Pelicia Hall, in her official capacity as Commissioner of the Mississippi Department of Corrections (“MDOC”), Earnest Lee, the Superintendent of the Mississippi State Penitentiary, and the Mississippi State Executioner, and respectfully supplement their Motion for Protective Order [Doc. 125] with the following additional exhibits:

Exhibit CC Defendants’ Second Supplemental Responses to Plaintiffs’ Interrogatories (11/06/2017);

Exhibit DD Memorandum Opinion (11/03/2017) [Doc. 14]; *In re: Virginia Department of Corrections v. Richard Jordan and Ricky Chase, et al.*; Eastern District of Virginia, Richmond Division, No. 3:17-cm-00002-MHL.

Respectfully submitted, this the 7th day of November, 2017.

**PELICIA HALL, in her official capacity as
Commissioner of the Mississippi Department of
Corrections, EARNEST LEE, in his official
capacity as Superintendent of the Mississippi State
Penitentiary, THE MISSISSIPPI STATE
EXECUTIONER, in his official capacity, and
UNKNOWN EXECUTIONERS, in their official
capacities**

BY: JIM HOOD, ATTORNEY GENERAL

By: s/Paul E. Barnes
Jason L. Davis, MSB No. 102157
Paul E. Barnes, MSB No. 99107
Wilson Minor, MSB No. 102663
SPECIAL ASSISTANT ATTORNEYS GENERAL
ATTORNEYS FOR DEFENDANTS

STATE OF MISSISSIPPI
OFFICE OF THE ATTORNEY GENERAL
P.O. Box 220
Jackson, MS 39205
Telephone: (601) 359-4072
Telefax: (601) 359-2003
pbarn@ago.state.ms.us

CERTIFICATE OF SERVICE

This is to certify that I, Paul Barnes, Special Assistant Attorney General for the State of Mississippi, have electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

James W. Craig
Emily M. Washington
RODERICK AND SOLANGE
MACARTHUR JUSTICE CENTER
4400 South Carrollton Ave.
New Orleans, LA 70119
jim.craig@macarthurjustice.org
emily.washington@macarthurjustice.org
ATTORNEYS FOR PLAINTIFFS
RICHARD JORDAN AND RICKY CHASE

Stacy Ferraro
STACY FERRARO, ATTORNEY AT LAW
239 N. Lamar Street, Ste. 604
Jackson, MS 39201
lifestoryms@gmail.com
ATTORNEY FOR INTERVENOR-
PLAINTIFF THOMAS EDWIN LODEN, Jr.

James Davis
Law Office of Jim Davis
1904 24th Avenue
Gulfport, MS 39502
JamesLDavisIII@aol.com

Richard F. Klawiter
Matt Klepper
DLA Piper LLP (US)
203 North LaSalle Street, Suite 1900
Chicago, Illinois 60601-1293

Nicholas F. Aldrich, Jr.
Schwabe, Williamson & Wyatt, P.C.
1211 SW Fifth Ave., Suite 1900
Portland, Oregon 97204
ATTORNEYS FOR INTERVENOR
ROGER ERIC THORSON

Sibyl Byrd
McDuff & Byrd
767 N. Congress St.
Jackson, MS 39202

Vanessa Carroll
1055 St. Charles Ave., Suite 505
New Orleans, LA 70130
ATTORNEYS FOR INTERVENOR
ROBERT SIMON, JR.

This the 7th day of November, 2017.

s/Paul Barnes
Paul E. Barnes